

**U.S. Department of Justice***United States Attorney  
Eastern District of New York*

FJN/RMP/LAB/AA/RU  
F. #2009R01065/OCDETF#NY-NYE-616

271 Cadman Plaza East  
Brooklyn, New York 11201

April 1, 2025

By ECF and E-Mail

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Ismael Zambada Garcia  
Criminal Docket No. 09-466 (BMC) (S-5)

Dear Judge Cogan:

The government respectfully writes on behalf of the parties to request that the status conference currently scheduled for April 22, 2025 be adjourned until June 16, 2025 or until a date convenient for the Court thereafter, and that time until such date be excluded from calculations under the Speedy Trial Act in the interests of justice. The government and the defense now share a joint scheduling conflict on April 22, 2025, and the government has thus consulted with Your Honor's courtroom deputy concerning other available dates and shared them with defense counsel. In addition, the parties have exchanged certain discovery materials and continued to discuss the potential for a resolution short of trial, while the capital case process and the government's assessment of potential classified discovery remain pending. In light of all of those factors and the parties' and the Court's availability, the parties jointly request that the conference be adjourned to June 16, 2025. Additionally, the parties jointly ask that time be

excluded for the above reasons and respectfully submit that the interests of justice served by the adjournment and exclusion of time outweigh the interests of the public and the defendant in a speedy trial.

Respectfully submitted,

JOHN J. DURHAM  
United States Attorney

By: /s/ Robert M. Pollack  
Francisco J. Navarro  
Robert M. Pollack  
Lauren A. Bowman  
Adam Amir  
Rebecca Urquiola  
Assistant U.S. Attorneys  
(718) 254-7000